

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CARLOS RAMIREZ
on behalf of himself and all others similarly
situated,

Plaintiff,

v.

THE PARADIES SHOPS, LLC,
a Georgia limited liability company,

Defendant(s).

Case No. 1:21-cv-03758-ELR

**UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Plaintiff Carlos Ramirez (“Plaintiff” or “Representative Plaintiff”), by and through the undersigned counsel, hereby moves this Court for an order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (1) preliminarily approving the proposed class action settlement with Defendant The Paradies Shops, LLC (“Paradies” or “Defendant”); (2) certifying the Settlement Class; (3) appointing Settlement Class Representative and Class Counsel; (4) approving Class Notice; (5) scheduling a date for the Final Fairness Hearing; (6) appointing Claims Administrator; and (7) for such other and further relief as the Court deems just and proper. In support of this motion, Representative Plaintiff concurrently submits the following attached to this Motion:

1. Exhibit 1: The Settlement Agreement and its exhibits;

2. Exhibit 2: Joint Declaration of Proposed Class Counsel;
3. Memorandum of Law In Support of Representative Plaintiff's Unopposed Motion; and,
4. A Proposed Order for Preliminary Approval of the Proposed Settlement.

Representative Plaintiff has negotiated a fair, adequate, and reasonable settlement that guarantees Settlement Class Members significant relief in the form of direct reimbursements for expenses incurred and time spent relevant to the Ransomware Attack, credit monitoring services for 3 years after the Ransomware Attack, Residual Cash Payments, and Defendant's promise to maintain the changed Business Practices implemented after the Ransomware Attack or adopt other business practice so long as there is no material adverse impact on information safety relative to the current state. For these and the reasons set forth in the supporting Memorandum of Law, Representative Plaintiff respectfully request this Court grant his Motion for Preliminary Approval of the Class Action Settlement.

Dated: September 16, 2024

Respectfully submitted,

**MORGAN & MORGAN COMPLEX
LITIGATION GROUP**

/s/ John A. Yanchunis

John A. Yanchunis
201 N. Franklin Street, 7th Floor
Tampa, Florida 33602
(813) 223-5505
jyanchunis@ForThePeople.com

MAXEY LAW FIRM, P.A.

/s/ Ryan D. Maxey

Ryan D. Maxey

107 N. 11th St. #402 Tampa, Florida
33602

(813) 448-1125

ryan@maxeyfirm.com

MORGAN & MORGAN PLLC

/s/ Dylan A. Bess

Dylan A. Bess

P.O Box 57007

Atlanta, GA 30343-1007

(404) 965-1885

dbess@forthepeople.com

CERTIFICATE OF SERVICE

I certify that on September 16, 2024 I filed the foregoing **UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record.

/s/ John A. Yanchunis

John A. Yanchunis

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned attorney hereby certifies that on this day the foregoing document was prepared in accordance with L.R. 5.1(C) using Times New Roman, 14 point font.

Dated: September 16, 2024

/s/ John A. Yanchunis
John A. Yanchunis